

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK VARIABLE
LIFE INSURANCE COMPANY, and
MANULIFE INSURANCE COMPANY (f/k/a
INVESTORS PARTNER INSURANCE
COMPANY),

Plaintiffs,

v.

ABBOTT LABORATORIES,

Defendants.

CIVIL ACTION NO. 05-11150-DPW
Hon. Judge Douglas P. Woodlock

**ABBOTT’S MOTION TO IMPOUND ITS MEMORANDUM, RESPONSE TO
STATEMENT OF FACTS, AND AFFIDAVIT OF OZGE GUZELSU IN OPPOSITION
TO HANCOCK’S MOTION FOR PARTIAL SUMMARY JUDGMENT**

Pursuant to Local rule 7.2, Defendant Abbott Laboratories (“Abbott”) respectfully moves for leave to file its Memorandum in Opposition to Plaintiff’s Motion for Partial Summary Judgment on Count II of First Amended Supplemental Complaint, and the accompanying Response to Hancock’s “Statement of Undisputed Facts” and Affidavit of Ozge Guzelsu (and exhibits thereto) under seal.

Abbott respectfully requests that the above referenced documents be impounded until further Order of the Court. In addition, Abbott respectfully requests that the Court accept the documents provisionally under seal pending the Court’s ruling on this Motion. Upon termination of the impoundment period, Abbott will retrieve and take custody of the documents.

The grounds for this motion are that the above referenced documents contain confidential and competitively sensitive information regarding Abbott and other pharmaceutical companies’

development of various drug compounds, Hancock's investment in such development, and Hancock's investments more generally. Disclosure of the information contained in these documents could cause competitive harm by providing competitors with proprietary information regarding Abbott's drug development program, as well as its market analysis and business strategies. Hancock does not oppose this motion.

ABBOTT LABORATORIES

By its attorneys

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Dated: Aug. 21, 2007

LOCAL RULE 7.1 CERTIFICATION

The undersigned hereby certifies that counsel for Abbott Laboratories has conferred with counsel for Plaintiffs in a good faith effort to resolve or narrow the issues in this Motion. Plaintiffs' counsel has confirmed that Plaintiffs do not oppose this motion.

/s/ Michael S. D'Orsi

Date: Aug. 21, 2007

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on August 21, 2007.

Date: Aug. 21, 2007

/s/ Michael S. D'Orsi